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ANSWER FOR CASE 2:11-CV-00721-LRH-PAL

2011 JUN -8 P 4:37

CLERK US DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BY ________ DEPUTY

Righthaven LLC,
a Nevada limited liability company,
Plaintiff
v.

Norman Edwards, Registrant
Computer Services One, LLC
919 18th Street South
Saint Petersburg, FL 33712
(727) 322-3993
contact@computerservicesone.com
Defendant

MOTION FOR DISMISSAL CASE 2:11-CV-00721 LRH-PAL

1. RightHaven is not the owner of the copyright of the literary work entitled "Former mayor lends name to new Ron's Steakhouse." RightHaven has no legal standing to enforce or pursue copyright.
2. The material in question was acquired by computer automation using data mining software that extracted content from major search engines such as Google and Yahoo without any knowledge, discretion or influence by Norman Edwards or any party associated with Computer Services One LLC.
3. The automated software did not specifically target the article in question.
4. Since the acquisition of the material was totally automated neither Norman Edwards, Computer Services One LLC nor any party associated with Computer Services One LLC had any knowledge that the material in question was posted to the website.
5. The material in question has been removed and is no longer being displayed.
6. Neither Norman Edwards, Computer Services One LLC nor any party associated with Computer Services One LLC knew of the infringement due to the automated nature of content acquisition.
7. Neither Norman Edwards, Computer Services One LLC nor any party associated with Computer Services One LLC knew of the infringement specific interest to the citizens of Nevada due to the automated nature of content acquisition.
8. The alleged infringement was available on the world wide internet. The alleged infringement was not specific to the citizens of Nevada.

9. The alleged infringement was not aimed specifically at the citizens of Nevada.
10. Righthaven does not have the standing to seize domains.
11. Because of the above enumerated reasons, Norman Edwards and Computer Services one LLC requests of the court and of RightHaven to have this lawsuit dismissed without prejudice due to Righthaven's lack of standing to sue and the lack of legal culpability, the lack of blameworthiness, on the part of Norman Edwards or Computer Services One LLC.
12. That because of the above reasons, Norman Edwards and Computer Services One LLC not be held to pay any attorneys' fees, costs or debts incurred by RightHaven LLC.
13. Norman Edwards and Computer Services one LLC requests of the court and of RightHaven a dismissal of this lawsuit as soon as possible.
14. All parties are hereby notified that Norman Edwards and Computer Services One, LLC has no assets. If penalized by a lawsuit Norman Edwards and Computer Services One, LLC may be forced to peruse either chapter 7/11/13 asset protection.